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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA
11 FRESNO DIVISION

12
13 **WILLIAM STEPHENSON, JOSHUA
14 FORSTER, AND THOMAS BODNAR,**

2:22-cv-1521-DAD-JDP

15 Plaintiffs,
16
17 v.
18 **STEPHANIE CLENDENIN AND
19 BRANDON PRICE,**

20 Defendants.

21 **STIPULATION**

22 Plaintiffs William Stephenson, Thomas Bodnar, and Joshua Forster (collectively,
23 “Plaintiffs”), and Defendants Stephanie Clendenin and Brandon Price (collectively with
24 Plaintiffs, the “Parties”); by and through their respective counsel, hereby stipulate and agree, and
25 request that this Court order as follows:

26 WHEREAS, on November 1, 2024, the Court granted the Parties’ request to consolidate
27 Plaintiff’s three individual cases (ECF No. 59);
28

1 WHEREAS, the Parties respectfully request that the Court grant a 30-day extension of time
2 in which to file their Consolidated Complaint, which is currently due on December 16, 2024, per
3 the Court's November 1, 2024, Order (ECF No. 59);

4 WHEREAS, Plaintiffs' counsel needs additional time to accommodate the difficulty of
5 exchanging draft documents with Plaintiffs, who can only receive draft documents in person or
6 via U.S. Postal Service;

7 WHEREAS, the Parties will also be meeting and conferring over the holiday season and
8 will therefore need additional time in which to meet and confer regarding the contents of
9 Plaintiff's proposed Consolidated Complaint; and

10 WHEREAS, this is the first extension of time sought by any Party since the Court
11 appointed counsel and consolidated Plaintiffs' individual cases (see ECF No. 59);

12 **IT IS HEREBY AGREED AND STIPULATED THAT:**

13 1. The Parties respectfully request that the Court grant a 30-day extension of time for
14 Plaintiffs to file their consolidated complaint, which is currently due on December 16, 2024, to
15 and including January 15, 2025.

16 2. Plaintiffs will prepare a consolidated complaint for Defendant's review and approval
17 to be filed by January 15, 2025. Should the parties be unable to reach agreement on the final
18 consolidated complaint after meeting and conferring the parties will seek additional guidance
19 from this Court.

20 3. Defendants have not yet filed a responsive pleading in *Bodnar v. Clendenin*, 2:22-cv-
21 01533-DAD-AC. Because Plaintiffs are preparing a consolidated complaint, the parties continue
22 to agree Defendants do not need to file a responsive pleading to the currently operative complaint
23 in that matter and will instead file a responsive pleading in response to the consolidated complaint
24 once it is filed and served.

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Respectfully submitted,
LIVE OAK LAW OFFICE LLP

Dated: December 13, 2024

/s/ Pilar R. Stillwater

Pilar R. Stillwater
Robyn Fass Wang
Attorneys for Plaintiffs:
William Stephenson, Thomas Bodnar, and Joshua Forster

Dated: December 13, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
BENJAMIN G. DIEHL
MAUREEN C. ONYEAGBAKO
Supervising Deputy Attorneys General

/s/ *Grant Lien*
GRANT LIEN
MICHAEL E. BYERTS
Deputy Attorneys General
Attorneys for Defendants
Clendenin and Price

1 **[PROPOSED] ORDER**

2 For good cause shown, the Court GRANTS the parties' stipulation, as follows:

3 1. Plaintiffs will prepare a consolidated complaint for Defendant's review and approval
4 to be filed by January 15, 2025. Should the parties be unable to reach agreement on the final
5 consolidated complaint after meeting and conferring the parties will seek additional guidance
6 from this Court.

7 2. Defendants will not be required to file a pleading in response to the currently
8 operative complaint in *Bodnar v. Clendenin*, Case No. 2:22-cv-1533-DAD-AC, and will instead
9 file a responsive pleading to the consolidated complaint once approved for filing. If a
10 consolidated complaint is not approved for filing, the parties will seek additional guidance from
11 this Court regarding the filing of a responsive pleading to the currently operative complaint in the
12 *Bodnar* case.

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14 IT IS SO ORDERED.

15 Dated: December 16, 2024


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17 JEREMY D. PETERSON
18 UNITED STATES MAGISTRATE JUDGE
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